



ADVISORY NOTICE

Rule 1113: **Section (b) Paragraphs (34) and (81)**
Original Review: **June 2011**
Revised Date: **March 2018**
Subject: **Categorization of Lacquers & Lacquer Undercoaters**

Issue:

The South Coast Air Quality Management District has been made aware of an uncertainty regarding the categorization of pigmented lacquers due to the Rule 1113 – Architectural Coatings June 3, 2011 amendment, which removed the pigmented lacquers category from the [Table of Standards](#) and re-categorized all the lacquers under the [clear wood finishes category](#).

Current Rule Language:

Section (b)(81) defines wood coatings as “film forming coatings used for application to wood substrates only, which are applied to substrates including floors, decks and porches. The Wood Coating category includes all lacquers, varnishes and sanding sealers, regardless of whether they are clear, semi-transparent or opaque.”

Section (b)(34) defines lacquers as “are clear or pigmented wood topcoats or clear lacquer sanding sealers, both formulated with nitrocellulose or synthetic resins to dry by evaporation without chemical reaction.”

Analysis:

The 2011 amendment consolidated all lacquers under a single category. Note that the lacquer category includes clear or pigmented finishes (topcoats) and sanding sealers but does not include lacquer undercoaters.

Conclusion:

Pigmented lacquers continue to be subject to the VOC content limit of 275 g/L, as listed under the wood coatings category, which is applicable to all lacquers as defined by Rule 1113. Lacquer undercoaters fall under the primer, sealer, undercoater category with a VOC limit of 100 g/L.

Comments or questions regarding Rule 1113 should be directed to areasources@aqmd.gov or call the Area Source team at 909-396-2390.